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RE: *U.S. ex rel. Singh, et al. v Bradford Regional Medical Center, et al.*
Case No. 04-CV-186E, United States District Court for the
Western District of Pennsylvania

Dear Dan and Carl:

In reviewing the transcripts of the depositions of Drs. Vaccaro, Saleh, Singh, Nadella, Kirsch, and Jacobs, it appears that you have purported to designate the entire depositions and all exhibits confidential. Although I see no such express designation on the BRMC 30(b)(6) deposition, the transcript contains a notation "Confidential – Protected Health Information." As before, when we objected to your attempts to designate all documents produced in this case as confidential, we believe that such overbroad designations are a misuse of the protective order. Accordingly, we object to your designation of the entire depositions and exhibits as confidential. If you would like to identify specific portions of the depositions, or specific portions of the exhibits, as confidential, we would consider such itemized designations individually.

Sincerely,



G. Mark Simpson

cc: Andrew M. Stone